



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 11, 2018

BY ECF & HAND DELIVERY

The Honorable Deborah A. Batts
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Thomas Carrano*, S1 17 Cr. 460 (DAB)

Dear Judge Batts:

On April 4, 2018, the Court issued an Order directing the Government to file with the Court its proposed Requests to Charge and proposed Voir Dire. In addition, the Court directed the Government to provide additional information regarding the underlying investigation. In conducting the underlying investigation, the Government executed multiple search warrants. The search warrants resulted in the seizure of electronic evidence, including video, for which the Government intends to seek admission. The videos are in English. The Government's investigation did not use confidential sources, cooperating witnesses, or wiretaps, and the Government does not intend to call as a witness any accomplice of the defendant. The Government expects that all Government witnesses will testify in English.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

by: 

Michael C. McGinnis
Alison G. Moe
Assistant United States Attorney
(212) 637-2305 / 2225

cc: Counsel of Record